

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
	)	
v.	)	Crim. No. 04-10122-RWZ
	)	
	)	
RENALD JEAN-BAPTISTE	)	

MOTION TO MODIFY TRAVEL RESTRICTION

The defendant Renald Jean-Baptiste respectfully moves this court to modify the travel restrictions placed on him as a condition of his release in this case so that he may travel to the state of New Jersey.

As background, the defendant appeared before this court on April 8, 2004 for the purpose of setting conditions of release. The defendant resides in New York City. He was ordered released on conditions which, *inter alia*, confined his right to travel to the states of New York, Connecticut, and Massachusetts. The defendant moves that the restriction be broadened so that he may travel to and from the state of New Jersey. He makes this motion because he has close friends in New Jersey whom he would like to visit while on release and because he wishes to explore employment prospects in New Jersey.<sup>1</sup>

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<sup>1</sup> The defendant was also ordered to seek employment if permitted to do so as a condition of release.

Undersigned counsel has spoken with Assistant United States Attorney Donald Cabell and Pretrial Services Officer Jason Lerman of the Southern District of New York<sup>2</sup> about this motion to modify the travel restrictions in this case. Undersigned counsel represents that neither counsel for the government nor the Pretrial Services officer has any objection to this proposed change to the defendant's release conditions.

WHEREFORE, the defendant respectfully requests that this motion to modify the travel restriction in this case be granted.

By his attorney,

/s/ Syrie D. Fried

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CERTIFICATE OF SERVICE

I, Syrie D. Fried, do hereby certify that a copy of the foregoing motion was served upon Assistant United States Attorney Donald Cabell this 12th day of May, 2004.

/s/ Syrie D. Fried

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Syrie D. Fried

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<sup>2</sup> Mr. Lerman can be reached at (212) 805-4109.